

EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,

Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**STIPULATION AND AGREED ORDER
REGARDING LATE CLAIMS FILED ON JULY 30, 2020**

1. On September 15, 2019 (the “**Petition Date**”), the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). These chapter 11 cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and the Order Directing Joint Administration of Chapter 11 Cases [Dkt. No. 59] entered by the Court on September 18, 2019, in each of the chapter 11 cases.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

2. On February 3, 2020, this Court set the bar date for claims to be filed in these cases as 5:00 p.m. (Prevailing Eastern Time) on June 30, 2020 (the “**General Bar Date**”). (Order (I) Establishing Deadlines for Filing Proofs of Claim & Procedures Relating Thereto, (II) Approving the Proof of Claim Forms, & (III) Approving the Form & Manner of Notice Thereof (Feb. 3, 2020), Dkt. No. 800 (the “**Bar Date Order**”).)

3. On June 3, 2020, this Court granted the Debtors’ request to extend the General Bar Date by thirty (30) days to July 30, 2020, at 5:00 p.m. (Prevailing Eastern Time) in light of concerns regarding the ongoing COVID-19 pandemic. (Order (I) Extending the General Bar Date for a Ltd. Period & (II) Approving the Form & Manner of Notice Thereof (June 3, 2020), Dkt. No. 1221 (the “**Extended General Bar Date Order**”).)

4. On July 30, 2020, between 5:01 p.m. (Prevailing Eastern Time) and 11:59 p.m. (Prevailing Eastern Time) 597 claims were filed with Prime Clerk LLC either electronically or by hand delivery (the “**Late Claims**”).²

5. Following discussion, and in an effort to move these cases toward resolution and preserve estates resources by avoiding litigation on potentially hundreds of motions to allow late proofs of claim, the Debtors and the Official Committee of Unsecured Creditors (the “**Creditor’s Committee**”, and together with the Debtors, the “**Parties**”), have, subject to Court approval, agreed to treat the Late Claims as timely filed on the terms set forth in this Stipulation.

AGREEMENT

6. The Parties agree as follows:

- a. Notwithstanding the Extended General Bar Date Order, the Debtors will treat the Late Claims as timely filed and will not object to the Late Claims based on

² The Late Claims covered by this Stipulation are listed in Exhibit A.

timeliness. For the avoidance of doubt, claimants who filed claims on July 30, 2020, between 5:01 p.m. (Prevailing Eastern Time) and 11:59 p.m. (Prevailing Eastern Time) need not file a motion to allow a late proof of claim in order to preserve their claims.

- b. The Debtors expressly reserve their right to object to the Late Claims on any other basis.
- c. Except as expressly set forth in this Stipulation, nothing contained herein shall be an admission or waiver of the substantive or procedural rights, remedies, claims, or defenses of any of the parties in these chapter 11 cases, whether at law or equity.
- d. The relief provided for herein shall apply to all of the Late Claims listed in Exhibit A, notwithstanding that the Creditor's Committee is the only creditor signatory to this Stipulation.³
- e. The Court shall retain exclusive jurisdiction over any and all disputes or other matters arising under or otherwise relating to this Stipulation.

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

³ Pursuant to the Bar Date Order, "To the extent that the Debtors, with the consent of the Creditor's Committee, seek to extend the General Bar Date, the Debtors may do so upon notice including a statement that the relief requested therein may be granted, pursuant to Local Rule 9074-1, without a hearing if no objection is timely filed and served in accordance with the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Dkt. No. 498]." (Bar Date Order ¶ 25.)

Dated: September 16, 2020
New York, New York

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So Ordered:

Dated: _____, 2020
White Plains, New York

THE HONORABLE ROBERT D DRAIN
UNITED STATES BANKRUPTCY JUDGE